

22-MJ-8076-AFF

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Lina Awad, having been duly sworn, hereby depose and state:

AGENT BACKGROUND

1. I am a Special Agent with United States Immigration and Customs Enforcement's Homeland Security Investigations ("HSI") and have been so employed since February 2009. I am currently assigned to the Office of the Special-Agent-in-Charge, Boston, Massachusetts. I am authorized to investigate crimes involving violations of Title 18, Title 8, Title 19, and Title 21 of the United States Code. I am a graduate of the Federal Law Enforcement Training Center in Glynco, Georgia, where I received training to become a federal agent. Specifically, I have received certification in the Criminal Investigator Training Program and the ICE Special Agent Training Program. I have received training relating to the trafficking in persons, including sex trafficking, and other offenses.

2. I have participated in investigations of human trafficking, human smuggling, alien harboring, border violations, drug and firearm trafficking, and related offenses. Many of these investigations have had national or international connections, and many required me to work closely and share information and intelligence with members of other federal, state, and local law enforcement agencies. I have debriefed, and continue to debrief, defendants, informants, and witnesses who have personal knowledge about human trafficking, including sex trafficking, and other crimes occurring in Massachusetts, nationally, and abroad.

3. From my training and experience, I know that individuals are trafficked for several purposes. Some forms of human trafficking involve involuntary servitude, peonage, debt bondage and slavery. Victims are often trafficked by force, fraud, and/or coercion. I am familiar with the federal laws regarding human trafficking, including 18 U.S.C. §§ 1591 and 1594 (Sex Trafficking).

4. This affidavit is submitted in support of a criminal complaint charging Sadeq Ali QURAISHI with Attempted Sex Trafficking of a Child, in violation of 18 U.S.C. §§ 1591(a)(1), (b)(2) and 1594(a).

5. As described below, there is probable cause to believe that, on November 2, 2022, in and around the greater Boston area, in the District of Massachusetts, Sadeq Ali QURAISHI did knowingly attempt to, in and affecting interstate and foreign commerce, entice, obtain, solicit, and patronize by any means a person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act.

6. This affidavit is based on my personal investigation and investigation by others, including federal and state law enforcement officials whom I know to be reliable and trustworthy. The facts contained herein have been obtained by conferring with other law enforcement officers and examining evidence obtained in the course of the investigation as well as through other means. This affidavit does not include every fact known to me about this investigation, but rather only those facts sufficient to establish probable cause.

STATEMENT OF FACTS

7. Beginning on or about November 1, 2022, law enforcement agents posted an advertisement (the “Advertisement”) on a website commonly used to advertise commercial sex acts.¹ The Advertisement indicated that the poster was in the area of Boston and Lowell, Massachusetts. The Advertisement contained images of what appeared to be two young females and the following language:

I AM A WOMAN seeking men

¹ Based on my training and experience, I know that the Internet is global network of computers, which is a means and facility of interstate commerce. I also know that the website on which the Advertisement was posted is maintained by an entity that is located outside of the United States, and the advertisements posted on that website are viewable outside of Massachusetts.

TIGHT, FRESH, and ready for FUN!!
 Travelin thru town on a lil roadtrip! cum get me while u can
 2 beautiful flowers that are ready to bloom
 ask about Fall specials and double trouble discount
 NO BULLSHIT, NO COPS, 100% Independent

8. The Advertisement indicated that the person who would perform commercial sex acts was 18 years old.² The Advertisement also contained a contact phone number (the “Advertisement Number”). Law enforcement agents monitored this line and an undercover agent (“UC1”) used it to communicate with potential sex buyers, including QURAISHI.

9. On or about November 2, 2022, the Advertisement Number received a text message from a phone number ending in 9824 (the “9824 Number”) in response to the Advertisement. Thereafter, a text conversation between UC1 and the user of the 9824 Number ensued. UC1 stated that he/she had two minor girls—ages 12 and 14 years old—available to perform sex acts in exchange for money. QURAISHI, using the 9824 Number, agreed to pay \$250 to have sex with the fictitious 14-year-old girl. Set forth below are QURAISHI’s text communications with the undercover agents:³

9824 Number	Hey there - where around Boston are you hosting?
UC1	me and my girls are in [Massachusetts town] area tonigt. you wanna play
9824 Number	Ah shoot - sorry hun I'm heading towards south Boston :(I'll definitely give you a shout to see if you're still around if I'm headed your way soon
UC1	well think about it. I got 14 yo [Name #1] and 12 yo [Name #2]. Def unique and so much fucking fun
9824 Number	Uh ... you a cop?
UC1	No way. just trying to make a living best way we know how.
9824 Number	Oh ok

² The law enforcement agents used a website that is known for containing prostitution advertisements but requires users to be at least 18 years old. Based on my training and experience, I know that this website and others like it have been used by traffickers to advertise the commercial sex acts of children under the age of 18.

³ Names and specific locations have been omitted.

UC1	are you. you gotta tell if u are
9824 Number	Heck no!
9824 Number	You threw me off with your text
9824 Number	Sounded like a trap ...
UC1	oh ok. scared me there for sec to
9824 Number	Same here!!!
UC1	sounds trappy i get but like some guys aint in to girsl that young and i just putting it out there so u stay cool
UC1	but i assure u even they yunger they are fun and know what they doing
9824 Number	Cool I appreciate that ... backdoor is ok too?
UC1	yeah it \$50 and Bri the 14 yo is only one that done that so far. jes may be to tight back there
9824 Number	Got it - is Bri the one on the add?
UC1	she is the one in the black shirt yes
9824 Number	You've got me interested ... and you're absolutely not involved with any law enforcement in any way?
UC1	fuck no. I was arrested in New mexico once when i was younger. that dont count i hope lol
9824 Number	Lol no
UC1	you not a serial killer right?
9824 Number	Fuck no!
9824 Number	So the total for a visit with the backdoor is?
UC1	1 or both. how long
9824 Number	1 for hh
UC1	which one baby
9824 Number	I thought only one of them was able to do backdoor?
UC1	just checking
UC1	so that's [Name #1]. She does do that. Half hour with her is \$150, \$50 extra for anal. so \$200. If you doing bare. it \$250
9824 Number	Ok let's go for option #3 lol
UC1	LMAO. So bare for \$250. u clean right?
9824 Number	Yes!
UC1	k cool. like what time u thinking baby
9824 Number	Around 2?
UC1	you in [Massachusetts town] area. i send u address when u closer.
UC1	just safety u know
9824 Number	I'm in east Boston so a ways away
UC1	You at a hotel or home?
UC1	well how fast u drive lol. and a hotel. we keep it low key for sure.
9824 Number	Gimme a general idea where ... several exists to get to [Massachusetts town]
UC1	so like [Street #1] and [Street #2]
9824 Number	Ok good

UC1	so u like on your way
9824 Number	Leaving in 5 min
9824 Number	Would never have done this if you were not so persuasive
UC1	oh ok. lol.
UC1	let me know when on your way and i got idea when have her ready.
UC1	i think you are having one of your dreams come true
9824 Number	I don't know ... I think everyone has fantasies but this seems a little over the top
UC1	nah its all natural
9824 Number	Hey you've been super nice and I appreciate it ... just the age thing is throwing me ... if you were to tell me she's 16 or older and just looks young enough to pass off for 14 that would be a different thing
UC1	its alright. i mean you can pretend if you want, but thats why i kee it realz. case peeps dont like it. shame. you were sweet but i get it
9824 Number	Thanks appreciate it. I'm all about having fun but this would just add an extra layer of guilt I defiantly don't need. Take care and be safe.
UC1	there is no guilt sex is a naruaal thing, but no worries. text later is you change mind
9824 Number	Cool thanks
9824 Number	Ugh ... man you're making things difficult - seems like a fun experience ... just not in the mood to get arrested today
UC1	well i dont plan on arresting you so as long as you are cool, its alright baby
UC1	we just trying to make a living is all
9824 Number	Ok I'm on my way
UC1	babe you are awesome. How long
9824 Number	30-35 min
UC1	[smiling face emoji]
9824 Number	Ok ... I'm trusting you
UC1	i get it. same here sweetie
UC1	dont forget cash ok and thanks
9824 Number	Yup got it
UC1	you getting close babe. [Name #1] is getting ready right now.
9824 Number	6 miles from [Massachusetts town]
UC1	cool
9824 Number	10 min away
9824 Number	Where am I going?
UC1	[Name #1] is all ready for you.
9824 Number	Where?
UC2	[hotel] hun I'll meet u outside
9824 Number	Ok
UC2	U need me to send address?
9824 Number	Nope I'm in the parking lot
UC2	I dont see u . . . standing outside by the side door

9824 Number	Where should I meet you?
9824 Number	Who should I be looking for?
UC2	Come to the side door hun dont wanna be going thru the front
9824 Number	Ok
UC2	Are u at the right hotel?
9824 Number	387
UC2	387 [street]
UC2	Yeah ouside in the parking lot there is a big blue trash dumpster here
9824 Number	Yup walking to the back

10. Shortly thereafter, QURAISHI arrived at a hotel in the greater Boston area.⁴ At the hotel, there was another undercover agent (“UC2”), who was posing as the person who posted the Advertisement and the user of the Advertisement Number. UC2 and QURAISHI met in the hotel’s parking lot. UC2 asked QURAISHI to show UC2 the cash to be paid for the commercial sex act. QURAISHI flashed a wad of cash from his pocket and showed it to UC2. UC2 gave QURAISHI a hotel key card and told him “no rough stuff” with her daughters. QURAISHI acknowledged UC2’s request.

11. Following the exchange of the cash and the foregoing discussion, law enforcement officers arrested QURAISHI and took him into custody. Incident to arrests, law enforcement agents searched QURAISHI and found a cell phone. An agent called then called the 9824 Number and observed that the cell phone they seized from QURAISHI rang.

12. QURAISHI is an anesthesiologist at Tufts Medical Center. During a post-arrest interview, and after being advised of his *Miranda* rights, QURAISHI indicated he has purchased sex in the past.

⁴ The hotel is part of a national chain of hotels. Based on information provided by hotel staff, I know that the hotel has served out-of-state guests.

CONCLUSION

13. Based on the foregoing, I respectfully submit that there is probable cause to support a criminal complaint charging Sadeq Ali QURAISHI with Attempted Sex Trafficking of a Child, in violation of 18 U.S.C. §§ 1591(a)(1), (b)(2) and 1594.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Lina Awad / by Paul G. Levenson
Lina Awad, Special Agent
Homeland Security Investigations

Attested to by the applicant in accordance
with the requirements of Fed. R. Crim. P. 4.1
by phone, on this 2nd day of November 2022,
at Boston, MA.


HONORABLE PAUL G. LEVENSON
UNITED STATES MAGISTRATE JUDGE

